




# policy NEWS.

## UPDATES CLARIFY QUALITY ASSURANCE REQUIREMENTS FOR NASA CONTRACTS

AUG. 12, 2013

A recent policy revision clarifies and updates NASA's requirements for performance of government contract quality assurance functions.

Updates to NASA Procedural Requirements (NPR) 8735.2B, Management of Government Quality Assurance Functions for NASA Contracts went into effect on Aug. 12, 2013. The changes include new allowances and requirements that reflect NASA's current strategic vision, priorities and resources.

NPR 8735.2B ensures that supplies and services acquired under government contract conform to the contract's quality requirements.

### WHAT'S NEW.

#### *The following changes were made to the NPR:*

**1.** The **definition** of “critical acquisition item” was **clarified** with the inclusion of detailed qualifiers and references to mission and payload classifications contained in other NASA documents. (See Section 2.1.1.)

#### **WHY IT MATTERS**

The categorization of critical acquisition items drives the level of government quality assurance to be performed. While items that posed a credible risk of loss of human life or serious injury were always considered critical acquisitions, the revised standard is more closely aligned with other NASA classifications of criticality.

#### **RATIONALE**

The revision makes the identification of critical acquisition items easier. Under the previous NPR, critical acquisitions were defined qualitatively and it was not always clear what qualified as a critical item.

**2.** A **note** was added **clarifying** how Federal Acquisition Regulation (FAR) Part 12 and Space Act Agreements **constrain government quality assurance**. (See Section 2.1.2 d.)

#### **WHY IT MATTERS**

Space Act Agreements and commercial acquisitions are not desirable ways of acquiring highly critical or complex items because they generally do not allow for the necessary quality assurance functions outlined in Section 2.6 of this NPR including product examinations, process witnessing and auditing functions.

#### **RATIONALE**

The previous NPR did not reflect these new, common ways of acquiring items. Language was needed to ensure practitioners are aware of the limitations attached to these types of acquisitions.

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## UPDATES CLARIFY QUALITY ASSURANCE REQUIREMENTS FOR NASA CONTRACTS *CONTINUED*

**3.** New language **explains** NASA's **options for assuring** the **quality** of commercial items acquired under FAR Part 12. (See Section 2.3.)

### **WHY IT MATTERS**

The addition outlines what the government *can* do in commercial acquisitions despite the limitations set forth by FAR Part 12, including third party certification, document reviews, record reviews, quality data analyses and final acceptance inspections.

### **RATIONALE**

Although FAR Part 12 prevents typical government quality assurance functions, some verification and review of critical and complex items are permissible and should be completed.

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**4.** A new section addresses **Commercially Available Off-the-Shelf** (COTS) items. (See Section 2.4.)

### **WHY IT MATTERS**

COTS items pose heightened quality risks and should generally be excluded from use in critical applications when non-COTS supply sources are available, unless they meet high quality and reliability standards or are otherwise best suited to meet NASA's interests.

### **RATIONALE**

Due to heightened risk, COTS purchases of critical items should be performed only as needed and carefully controlled.

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**5.** A section on **research and development acquisitions** was **added**, including specific quality system evaluations that must occur at contractor facilities. (See Section 2.5.)

### **WHY IT MATTERS**

When critical or complex research and development is occurring, the government must go to the contractor facility and conduct quality reviews to ensure conformance to contract requirements.

### **RATIONALE**

The previous version of the NPR did not outline these types of acquisitions or the necessary evaluations; such clarifications were necessary for proper quality assurance.

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**6.** The revised NPR provides **exemptions** to the requirement to **review a contractor's quality system processes** every three years, at a minimum. (See Section 2.6.3.2.)

### **WHY IT MATTERS**

Under the updated NPR, quality system evaluations may be postponed, exempted or limited in scope if certain risk criteria are met.

### **RATIONALE**

The exemptions provide cost savings in circumstances where there is high confidence that the contractor will supply conforming products and such quality reviews are unnecessary.

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**7.** The updated NPR requires the program, project, center Safety and Mission Assurance (SMA) office, or delegated representatives of those offices to **forward quality system audit results** involving findings against agency-wide standards to Supplier Assessment System (SAS) administrators **for posting to the SAS website**. (See Section 2.6.3.5.)

### **WHY IT MATTERS**

The new requirement will give centers agency-wide access to quality audits performed by other centers.

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## UPDATES CLARIFY QUALITY ASSURANCE REQUIREMENTS FOR NASA CONTRACTS *CONTINUED*

### **RATIONALE**

The new requirement can potentially result in substantial cost savings by eliminating unnecessary and duplicate audits.

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**8. Exceptions** were added to the requirement to perform **Government Mandatory Inspection Points** (GMIPs) for all safety-critical attributes. (See Section 8.2.1.)

### **WHY IT MATTERS**

In the past, the government had to verify every safety-critical attribute, no exceptions. The revision outlines conditions that if met, allow GMIP exemptions.

### **RATIONALE**

Verifying every safety-critical attribute is costly; the exemptions can save money without compromising technical rigor or undertaking undue risk if conducted under carefully evaluated and controlled conditions.

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### **TAKE ACTION**

These changes affect all NASA programs and projects. Program and project managers should review the revised standard and share it with their teams. Center SMA and Quality organizations involved with acquisitions also need to review this document and work with program and project offices to effectively implement the changes.

Have questions on the updated NPR? Contact Brian Hughitt, NASA Technical Fellow for Quality Engineering, at [Brian.Hughitt-1@nasa.gov](mailto:Brian.Hughitt-1@nasa.gov).

**or**

View the official NASA document at  
<http://nodis3.gsfc.nasa.gov/displayDir.cfm?t=NPR&c=8735&s=2A>